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6 Attorneys for Plaintiff
United States of America

7
8 IN THE UNITED STATES DISTRICT COURT
9
EASTERN DISTRICT OF CALIFORNIA

10 UNITED STATES OF AMERICA,

11 Plaintiff,

12 v.

13 MICHAEL ANDREW SCOTT,

14 Defendant.

CASE NO. 2:24-CR-00097-KJM

STIPULATION AND ORDER TO AMEND
JUDGMENT TO INCLUDE ADDITIONAL
CLAIMS FOR RESTITUTION

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17 Plaintiff United States of America, by and through its undersigned attorney of record, and
18 defendant MICHAEL ANDREW SCOTT, both individually and by and through his counsel of record,
19 hereby stipulate as follows:

- 20 1. On October 8, 2024, SCOTT pled guilty to one count of Wire Fraud pursuant to a plea
21 agreement. (*See* ECF No. 28). In the plea agreement, among other provisions, SCOTT
22 agreed: (i) that his offense conduct was governed by the Mandatory Victim Restitution Act;
23 and (ii) to pay the full amount of restitution to all victims affected by his offense in a total
24 amount between \$338,843.51 and \$550,000. (*See* ECF No. 26).
- 25 2. On February 18, 2025, SCOTT was sentenced to a term of imprisonment of 33 months and
26 ordered to pay restitution in the amount of \$376,044.83. (*See* ECF No. 39). At the sentencing
27 hearing, the parties were made aware of two additional victims, and resolved on the record to
28 conduct further investigation and stipulate to an amended restitution amount if appropriate.

- 1 3. On February 21, 2025, the Court entered a Judgement and Commitment that ordered SCOTT
2 to pay total restitution of \$376,044.83 to sixteen (16) identified victims in individually listed
3 amounts. (*See* ECF No. 40).
- 4 4. The parties have since completed their investigation. In addition to the two victims discussed
5 at the sentencing hearing, the parties have investigated additional claims presented by a
6 further two victims.
- 7 5. SCOTT hereby agrees to pay restitution to the following additional victims in the amounts
8 stated:

Jeffrey Campbell, Sacramento, CA	\$32,000.00
Tay Nguyen, Sacramento, CA	\$12,000.00
Abby Gonik, Sacramento, CA	\$4,500.00
Alex Bot, Rocklin, CA	\$10,200.00

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13 6. SCOTT further agrees that the total amount of restitution owed shall now be \$434,744.83 so
14 as to incorporate the above-stated amounts. SCOTT agrees that, as to these additional
15 victims, his conduct is governed by the Mandatory Victim Restitution Act.
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17 7. The parties stipulate to and request that the Court issue an amended judgment: (i) reflecting
18 the new total amount of restitution owed of \$434,744.83 on Sheet 5, in the section entitled
19 “Criminal Monetary Penalties”; and (ii) including the additional victims identified and listing
20 the individual restitution amounts owed on Sheet 5B.

21 IT IS SO STIPULATED

22 Dated: 4/2/25

23 /s/ Candice Fields

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CANDICE L. FIELDS
Attorney for Defendant

1 Dated: 4/2/25

/s/ Michael Andrew Scott
MICHAEL ANDREW SCOTT
Defendant

5 Dated: April 2, 2025

MICHELE BECKWITH
Acting United States Attorney

7 By: Dhruv Sharma
DHRUV M. SHARMA
8 Assistant United States Attorney

9
10 **ORDER**

11 Pursuant to the Mandatory Victim Restitution Act, 18 U.S.C. § 3663A, SCOTT shall pay
12 restitution to the following additional victims in the amounts stated:

Jeffrey Campbell, Sacramento, CA	\$32,000.00
Tay Nguyen, Sacramento, CA	\$12,000.00
Abby Gonik, Sacramento, CA	\$4,500.00
Alex Bot, Rocklin, CA	\$10,200.00

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14 An Amended Judgment and Commitment shall issue: (i) amending the total restitution amount
15 owed to \$434,744.83 on Sheet 5, in the section entitled “Criminal Monetary Penalties” and; (ii) adding
16 the victims and amounts listed above to the list of victims previously identified on Sheet 5B.
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18 IT IS SO FOUND AND ORDERED this 3rd day of April, 2025.

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UNITED STATES DISTRICT JUDGE